



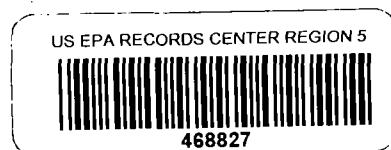
**CONESTOGA-ROVERS
& ASSOCIATES**

2055 Niagara Falls Blvd., Suite #3,
Niagara Falls, New York 14304
Telephone: (716) 297-6150 Facsimile: (716) 297-2265
www.CRAworld.com

August 1, 2013

Reference No. 056393-08

Mr. Michael Berkoff
Remedial Project Manager
U.S. Environmental Protection Agency - Region V
Superfund Division, Remedial Response Section #2
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3590



Dear Mr. Berkoff:

Re: Amendment to the Operation, Maintenance and Monitoring Plan
12th Street Landfill Operable Unit No. 4
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Allegan and Kalamazoo County

On behalf of Weyerhaeuser NR Company (Weyerhaeuser), Conestoga-Rovers & Associates (CRA) has prepared this letter to request an amendment to the United States Environmental Protection Agency (USEPA) approved Operations, Maintenance and Monitoring Plan (OMMP) for the 12th Street Landfill Site located in Otsego Township, Michigan (Site). The amendment to the OMMP consists of discontinuing the use of USEPA Method 1631E for the low-level mercury analysis and in its place using USEPA Method 254.1 for the mercury analysis of groundwater. This request is based on recent changes the Michigan Department of Environmental Quality (MDEQ) made to its policy on evaluating mercury in groundwater plumes relative to the Groundwater/Surface Water Interface (GSI) pursuant to Part 201.

As specified in the OMMP, groundwater samples are analyzed for low-level mercury from the 15 Site monitoring wells. Following seven rounds of groundwater sampling, mercury was detected in concentrations above the GSI criterion for mercury of 0.0013 micrograms per liter ($\mu\text{g/L}$) in the following four wells:

Monitoring Well	Date of Exceedance	Reported Result
MW-101S	5/1/2013	0.00173 $\mu\text{g/L}$
MW-101D	1/28/2013	0.00136 $\mu\text{g/L}$
MW-106S	10/26/2011	0.0203 $\mu\text{g/L}$
	2/7/2012	0.00447 $\mu\text{g/L}$
	10/22/2012	0.0118 $\mu\text{g/L}$
	1/29/2013	0.00777 $\mu\text{g/L}$
MW-108S	5/9/2013	0.0656 $\mu\text{g/L}$
	4/26/2012	0.00141 $\mu\text{g/L}$
	1/29/2013	0.0038 $\mu\text{g/L}$

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The maximum detected concentration of mercury from all seven events was 0.0656 µg/L, detected in the May 9, 2013 sample collected from MW-106S.

According to the MDEQ issued Policy and Procedure Number 09-014 dated June 20, 2012, "Evaluating Mercury in Groundwater Plumes Relative to the GSI Pursuant to Part 201", concentrations of mercury below 0.2 µg/L are considered to be a de minimis condition pursuant to Section 20120e of Part 201, and activity beyond evaluation is not be required. The proposed alternative method for analyzing mercury, USEPA Method 245.1, will accurately detect and quantify any mercury present at or above the MDEQ quantification level for mercury of 0.2 µg/L for venting groundwater.

As stated above the highest concentration of mercury detected in the seven rounds of groundwater monitoring at the Site was 0.0656 µg/L, which is well below the MDEQ quantification level for mercury of 0.2 µg/L for venting to groundwater presented in MDEQ's Policy and Procedure. Therefore, the low-level mercury present at the Site is considered de minimis following the MDEQ Policy and Procedure. As a result, continued low-level mercury sampling is not warranted.

Therefore, Weyerhaeuser formally requests USEPA approval to discontinue the low-level mercury sampling at the Site. Weyerhaeuser proposes to collect groundwater for mercury analysis using USEPA Method 245.1 to quantify the concentrations of mercury in the Site's groundwater at the 15 wells on Site during future sampling events.

The revised (Revision 03 Addendum 06) Multi-Area Quality Assurance Project Plan, currently, being reviewed by the USEPA, already includes USEPA Method 245.1 for mercury analysis and therefore will not require another addendum to cover this request.

Please provide a response to this request no later than September 15, 2013 so that appropriate arrangements can be made for the next scheduled sampling event in October 2013. Should you have any questions on the above, please do not hesitate to contact me at (716) 297-6150 to discuss the requested amendment to the OMMP.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Gregory A. Carli, P. E.

JMD/gac/ejh/25/Pwl



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	5/9/2013	0.0656 µg/L
MW-108S	4/26/2012	0.00141 µg/L
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